## EXHIBIT G

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

NATIONAL CREDIT UNION ADMINISTRATION BOARD,

Case No. 11-2340 JWL (JPOx)

Plaintiff,

Judge John W. Lungstrum

v.

RBS SECURITIES, INC. formerly known as Greenwich Capital Markets, Inc., et al.,

Defendants.

NATIONAL CREDIT UNION ADMINISTRATION BOARD,

Plaintiff,

V.

WACHOVIA CAPITAL MARKETS, LLC, now known as Wells Fargo Securities, LLC,

Defendant.

Case No. 11-2649 RDR (KGSx)

RBS SECURITIES INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO NATIONAL CREDIT UNION ADMINISTRATION BOARD

Pursuant to Federal Rule of Civil Procedure 34, Defendant RBS Securities, Inc. requests that Plaintiff National Credit Union Administration Board produce the following categories of documents within thirty days of service hereof at the offices of Foulston Seifkin LLP, 1551 N. Waterfront Parkway, Suite 100, Wichita, Kansas 67206. For definitions and instructions relating to these interrogatories, please refer to the section below entitled "Definitions and Instructions."

## **REQUESTS**

- 1. All documents concerning each of the Trusts and each of the Certificates.
- 2. All documents supporting Your contention that RBS made false or misleading representations or omissions, including in prospectuses and prospectus supplements, regarding the Certificates or Trusts.
- 3. All documents concerning forensic reviews You commissioned using retrospective automated valuation models (AVMs).
- 4. All of Your communications with U.S. Central concerning any of the Trusts or the Certificates.
- 5. All of Your communications with U.S. Central concerning any Residential Mortgage-Related Security.
- 6. All documents provided to You by U.S. Central concerning any Residential Mortgage-Related Security or any of the Trusts or Certificates.
- 7. All documents that You provided to U.S. Central concerning any Residential Mortgage-Related Security or any of the Trusts or Certificates.
- 8. All reports, recommendations, and analyses that You received from U.S. Central concerning any Residential Mortgage-Related Security or any of the Trusts or Certificates.

- 9. All documents concerning any of the mortgage loans in the collateral pool of any of the Trusts or backing any of the Certificates.
- 10. All documents concerning the loan-to-value ratios of any of the mortgage loans in the collateral pool of any of the Trusts or backing any of the Certificates.
- 11. All documents concerning an appraisal or other valuation of any property that is or was made of any of the mortgage loans in the collateral pool of the Trusts or backing any of the Certificates.
  - 12. All documents concerning the credit ratings of any of the Certificates.
- 13. All of Your or U.S. Central's communications with credit ratings agencies, including S&P, Moody's or Fitch, concerning the credit rating of any of the Certificates or any other certificate issued by the Trusts.
- 14. All documents concerning the owner-occupancy status of any property that is or was subject to any of the mortgage loans in the collateral pool of any of the Trusts or backing any of the Certificates.
- 15. All documents concerning or considered in Your or U.S. Central's decision to acquire, hold or dispose of any of the Certificates.
- 16. All documents concerning any investigation, evaluation or risk assessment concerning any of the Certificates or any of the mortgage loans in the collateral pool of any of the Trusts.
- 17. All analyses, valuations, studies or investigations concerning or considered in Your or U.S. Central's decision to acquire, hold, or dispose of any of the Certificates.
- 18. All documents concerning any investment that U.S. Central considered making as a complete or partial alternative to U.S. Central's investment in any of the Certificates.